

1 PARSONS BEHLE & LATIMER
2 Rew R. Goodenow, Bar No. 3722
3 50 West Liberty Street, Suite 750
4 Reno, NV 89501
5 Telephone: (775) 323-1601
6 Facsimile: (775) 348-7250
7 RGoodenow@parsonsbehle.com

Efiled: January 21, 2011

8 Attorneys for City of Elko

9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

IN THE UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

In Re:

Case No. 11-50084-BTB
(Chapter 11)

ELKO GOLD MINE, LLC,

Debtor.

**REQUEST FOR SPECIAL NOTICE PURSUANT
TO BANKRUPTCY RULE 2002**

PLEASE TAKE NOTICE that Rew R. Goodenow of PARSONS BEHLE & LATIMER, on behalf of City of Elko, hereby requests, pursuant to Bankruptcy Rule 2002, special notice of all motions, applications, hearings, orders, writings, proceedings, and the like in the above-captioned matters including, but not limited to, the following:

1. All matters and papers which must be sent to creditors, equity security holders, or the unsecured creditors' committee;

2. All matters regarding relief from the automatic stay under Section 362 of the Bankruptcy Code;

3. All matters regarding the use, the sale, or the lease of the Debtor's property under Section 363 of the Bankruptcy Code;

4. All matters regarding the obtaining of credit under Section 364 of the Bankruptcy Code;

5. All matters regarding executory contracts and unexpired leases under Section 365 of the Bankruptcy Code;

6. All matters regarding the time requirements to file claims against the Debtor;

7. All matters regarding reorganization of the Debtor, including a copy of any disclosure statement or plan or reorganization;

8. All matters regarding any adversary proceeding filed by or against the Debtor; and

9. All documents filed by any party in any adversary proceeding.

Neither this request for notice, nor any subsequent appearance, pleadings, claim, proof of claim, document, suit, motion, or any other writing or conduct shall constitute a waiver by these creditors of the following rights:

1. Right to have any final orders in any non-core matters entered only after de novo review by a United States District Judge;

2. Right to trial in any proceeding in which this right exists, whether the right be designed legal or private, whether the right is asserted in any related case, controversy or proceeding, notwithstanding the designation *vel non* of the proceeding as "core" under 28 U.S.C. Section 157(b)(2)(H), and whether the right is asserted under statute or the United States Constitution;

3. Right to have the United States District Court withdraw the reference of this matter in any proceeding subject to mandatory or discretionary withdrawal; or

4. Other rights, claims, actions, defenses, set-offs, recoupments, or other matters to which this party is entitled under any agreements, at law or in equity, or under the United States Constitution.

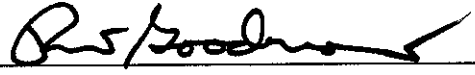
1 Filing this request for notice or participating in this bankruptcy proceeding shall not be
2 deemed to constitute a concession or admission of jurisdiction in this case or before this Court.

3
4 City of Elko further requests that all such notices be addressed to it as follows:

5
6 Rew R. Goodenow
7 PARSONS BEHLE & LATIMER
8 50 W. Liberty Street, Suite 750
9 Reno, NV 89501
10 (775) 323-1601
11 (775) 348-7250 (Facsimile)
12 Email: rgoodenow@parsonsbehle.com

13
14 Dated: January 21, 2011.

PARSONS BEHLE & LATIMER

15 By: 
16 Rew R. Goodenow
17 Attorneys for City of Elko
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE


I hereby certify that on this 21st day of January, 2011, I caused to be filed and served through the Bankruptcy Court's ECF system, a true and correct copy of the foregoing REQUEST FOR SPECIAL NOTICE PURSUANT TO BANKRUPTCY RULE 2002 to:

Alan R. Smith
505 Ridge St
Reno, NV 89501
(775) 786-4579
mail@asmithlaw.com
Attorney for Elko Gold Mine

A.J. Kung
214 South Maryland Parkway, Suite A
Las Vegas, NV 89101
(702) 382-0883
ajkung@ajkunglaw.com
Attorney for Elko Gold Mine

Bernard D. Bollinger, Jr.
Buchalter Nemer, P.C.
1000 Wilshire Blvd., Suite 1500
Los Angeles, CA 90017
(213) 891-5009
bbollinger@buchalter.com
Attorney for Excel National Bank

Stephen C. Tingey
Ray Quinney & Nebeker
36 South State Street, Suite 1400
P.O. Box 45385
Salt Lake City, Utah 84145
(801) 532-1500
stingey@rqn.com
Attorney for Contempo Ceramic Tile


Employee of Parsons Behle & Latimer